



*Hooper, Y.*

USDC SDNY

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May 16, 2025

The Honorable Judge Analisa Torres  
 United States District Court  
 US District Court For The Southern District of New York  
 500 Pearl St New York,  
 NY 10007

**Re: SDNY, 22 Cr. 125-4, USA vs. Weifa Zhang  
 LETTER MOTION TO SUBSTITUTE COUNSEL  
 AND REQUEST PASSPORT RELEASE**

Dear Judge Analisa Torres ,

I am the counsel for Mr. Weifa Zhang in his immigration proceedings following his federal criminal conviction in the Southern District of New York on January 16, 2024. As part of the underlying criminal case, Mr. Zhang surrendered his Chinese passport to the Court.

On April 14, 2025, the Immigration Court in Philadelphia issued an order of removal against Mr. Zhang. He is currently detained at FCI Allenwood Low, with an expected release date of August 11, 2025. His Chinese passport expired on June 15, 2024. Exhibit A, immigration court court order dated April 14, 2025.

We contacted the AUSA regarding the return of his passport and were advised to file a formal request with the Court.

Accordingly, we respectfully request:

1. That the Court approve the substitution of counsel, allowing the undersigned to appear on the record in place of prior counsel Mr. Lance Lazzaro, who has consented and executed the enclosed Substitution of Attorney form; Exhibit B.
2. That the Court order the release of Mr. Zhang's expired Chinese passport to him (or to his designated representative) so that renewal procedures may begin in light of the pending removal order. Exhibit C. Copy of Weifa Zhang's expired Chinese passport.



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Thank you for Your Honor's time and consideration.

Respectfully submitted,

Hooper, Yang & Associates P.C.

A handwritten signature in black ink, appearing to read "Leonard X. Gillespie".

By: Leonard X. Gillespie, Esq.  
Attorney for Mr. Weifa Zhang

**Enclosures:**

- Exhibit A. Immigration court Order of Removal
- Exhibit B. Executed Substitution of Attorney Form
- Exhibit C. Copy of Expired Passport

Cc:

Cecilia Vogel  
United States Attorney's Office, SDNY  
One Saint Andrew's Plaza  
New York, NY 10007  
cecilia.vogel@usdoj.gov

The Government shall release Defendant's Chinese passport to him or his designated representative.

By **May 27, 2025**, attorney Lance Lazzaro shall file a response to Defendant's *pro se* letter motion at ECF No. 147. In his response, he shall indicate whether he or attorney Leonard Gillespie intends to represent Defendant in connection with that motion.

SO ORDERED.

Dated: May 19, 2025  
New York, New York

A handwritten signature in black ink, appearing to read "Analisa Torres".

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ANALISA TORRES  
United States District Judge